

1 COOLEY LLP  
STEPHEN C. NEAL (170085) (nealsc@cooley.com)  
2 PATRICK E. GIBBS (183174) (pgibbs@cooley.com)  
3175 Hanover Street  
3 Palo Alto, California 94304-1130  
Telephone: +1 650 843 5000  
4 Facsimile: +1 650 849 7400

5 Attorneys for Defendants  
TESLA, INC., ELON MUSK, BRAD W. BUSS,  
6 ROBYN DENHOLM, IRA EHRENPREIS,  
ANTONIO J. GRACIAS, JAMES MURDOCH,  
7 KIMBAL MUSK, and LINDA JOHNSON RICE

8 LEVI & KORSINSKY, LLP  
ADAM M. APTON (SBN 316506)  
9 ADAM C. MCCALL (SBN 302130)  
388 Market Street, Suite 1300  
10 San Francisco, CA 94111  
Telephone: (415) 373-1671  
11 Facsimile: (212) 363-7171

12 Attorneys for Lead Plaintiff  
13 GLEN LITTLETON and the Class

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION  
17

18  
19 IN RE TESLA, INC. SECURITIES  
20 LITIGATION

Case No. 3:18-cv-04865-EMC

**JOINT CASE MANAGEMENT  
STATEMENT**

Date: January 14, 2021  
Time: 10:30 a.m.  
Judge: Hon. Edward M. Chen

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23  
24 Lead Plaintiff Glen Littleton (“Lead Plaintiff”) and Defendants Tesla, Inc., Elon Musk, Brad  
25 W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and  
26 Linda Johnson Rice (“Defendants”) (collectively, Lead Plaintiff and Defendants are referred to as  
27 the “Parties”) submit this Joint Case Management Statement under the Standing Order for All  
28 Judges of the Northern District of California and Civil Local Rule 16-10(d).

1 The last status conference in this matter occurred on December 3, 2020, during which the  
2 Court ordered a further status conference to occur on January 14, 2021. (ECF No. 300.)

3 **1 - 7. JURISDICTION AND SERVICE, FACTS, LEGAL ISSUES, MOTIONS,**  
4 **AMENDMENT OF PLEADINGS, EVIDENCE PRESERVATION, DISCLOSURES.**

5 There have been no updates to these categories since the Parties' last joint case management  
6 statement, filed November 25, 2020. (ECF No. 297.)

7 **8. DISCOVERY.**

8 Discovery is ongoing with a non-expert discovery cut-off of June 15, 2021. Remaining  
9 discovery includes document discovery, depositions, and third-party discovery. Lead Plaintiff  
10 anticipates filing a Motion for Issuance of a Request for Judicial Assistance (Letters Rogatory)  
11 shortly.

12 The Parties continue to conduct discovery in good faith and have identified no discovery  
13 disputes to date. The Parties agree to meet and confer in good faith if any dispute arises.

14 **9 - 11. CLASS ACTIONS, RELATED CASES, RELIEF.**

15 There have been no updates to these categories since the Parties' last joint case management  
16 statement, filed November 25, 2020. (ECF No. 297.) Lead Plaintiff has provided a draft Class  
17 Notice to Defendants and the parties anticipate submitting it and a proposed Notice Plan for  
18 consideration by the Court by the January 22, 2021 deadline established by the Court.

19 **12. SETTLEMENT AND ADR.**

20 The Parties expect to schedule a mediation in February or March, 2021. Eric Green of  
21 Resolutions, LLC will conduct the mediation.

22 **13 - 20. CONSENT TO MAGISTRATE JUDGE FOR ALL PROCEEDINGS, OTHER**  
23 **REFERENCES, NARROWING OF ISSUES, EXPEDITED TRIAL PROCEDURE,**  
24 **SCHEDULING, TRIAL, DISCLOSURE OF NON-PARTY INTERESTED**  
25 **ENTITIES OR PERSONS, PROFESSIONAL CONDUCT.**

26 There have been no updates to these categories since the Parties' last joint case management  
27 statement, filed November 25, 2020. (ECF No. 297.)  
28

1 Dated: January 7, 2021

COOLEY LLP

2 By: /s/ Patrick E. Gibbs  
3 Patrick E. Gibbs

4 Stephen C. Neal (170085)  
5 Patrick E. Gibbs (183174)  
6 Samantha A. Kirby (307917)  
7 3175 Hanover Street  
8 Palo Alto, CA 94304-1130  
9 Telephone: (650) 843-5000  
10 Facsimile: (650) 849-7400  
11 Email: nealsc@cooley.com  
12 pgibbs@cooley.com  
13 skirby@cooley.com

14 Sarah M. Lightdale (*pro hac vice*)  
15 Brian M. French (*pro hac vice*)  
16 Bingxin Wu (*pro hac vice*)  
17 55 Hudson Yards  
18 New York, NY 10001-2157  
19 Telephone: (212) 479-6000  
20 Facsimile: (212) 479-6275  
21 Email: slightdale@cooley.com  
22 bfrench@cooley.com  
23 bwu@cooley.com

24 *Attorneys for Defendants Tesla, Inc., Elon Musk,*  
25 *Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,*  
26 *Antonio J. Gracias, James Murdoch, Kimbal*  
27 *Musk, and Linda Johnson Rice*  
28

1 Dated: January 7, 2021

LEVI & KORSINSKY, LLP

2 By: /s/ Adam M. Apton

3 Adam M. Apton

4 Adam M. Apton (316506)  
5 Adam C. McCall (302130)  
6 388 Market Street, Suite 1300  
7 San Francisco, CA 94111  
8 Telephone: (415) 373-1671  
9 Facsimile: (212) 363-7171  
10 Email: aapton@zlk.com  
11 Email: amccall@zlk.com

12 Nicholas I. Porritt (admitted pro hac vice)  
13 Alexander A. Krot III (admitted pro hac vice)  
14 1101 30th Street NW, Suite 115  
15 Washington, D.C. 20007  
16 Telephone: (202) 524-4290  
17 Facsimile: (212) 363-7171  
18 Email: nporritt@zlk.com  
19 Email: akrot@zlk.com

20 Joseph Levi (admitted pro hac vice)  
21 Eduard Korsinsky (admitted pro hac vice)  
22 55 Broadway, 10th Floor  
23 New York, New York 10006  
24 Tel: (212) 363-7500  
25 Fax: (212) 363-7171  
26 Email: jlevi@zlk.com  
27 Email: ek@zlk.com

28 Pursuant to Civil Local Rule No. 5-1(i)(3), all signatories concur in filing this Joint Case  
Management Statement.

Dated: January 7, 2021

COOLEY LLP

By: /s/ Patrick E. Gibbs

PATRICK E. GIBBS